

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GEORGIA M. BROWN,

Plaintiff,

vs.

VHS OF MICHIGAN, INC.,
d/b/a/ DETROIT MEDICAL CENTER,
A Delaware For Profit Corporation,

Defendant.

Case No. 11-cv-15508

Hon. Robert H. Cleland
Magistrate Judge Mona K. Majzoub

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**STIPULATED PROTECTIVE ORDER AS TO DEFENDANT'S PRODUCTION OF
DOCUMENTS REGARDING CURRENT AND FORMER EMPLOYEES**

**STIPULATED PROTECTIVE ORDER AS TO DEFENDANT'S PRODUCTION OF
DOCUMENTS REGARDING CURRENT AND FORMER EMPLOYEES**

At a session of said Court held on
May 11, 2012

PRESENT: ROBERT H. CLELAND

HAVING BEEN DULY ADVISED by the parties that they have agreed to entry of this Stipulated Protective Order As To Defendant's Production of Documents Regarding Current and Former Employees; and otherwise being duly advised in the premises; and, therefore,

IT IS HEREBY ORDERED THAT Plaintiff Georgia M. Brown, and her attorney, shall use the documents produced by Defendant, listed below, only for purposes of this litigation, and shall not use the documents for any other purpose or proceeding, and shall not give to any person (other than to this Court or to representatives of this Court, or to Defendant's attorneys, or to Plaintiff's experts), the documents, or copies thereof, or disclose to any person (other than to this Court or to representatives of this Court, or to Defendant's attorneys, or Plaintiff's experts), the information contained in said documents -- unless first obtaining the written permission of this Court or Defendant's attorneys. The documents to which this Protective Order applies are as follows:

1. The resumes of Patricia Wilkerson-Uddyback, M.D; Dajuan Smith; Barbara A. Washington; Michele E. Berry; Daniel P. Keehner; and Arnettie Morton;
2. The resumes of all other current and former employees with respect to whom resumes are produced during this litigation; and
3. All documents which contain information regarding the qualifications, job and education histories, and other personal information regarding Defendant's current and former employees.

IT IS HEREBY FURTHER ORDERED THAT, after this case is concluded and all appeal rights exhausted, Plaintiff and her attorney shall return all of the listed documents, and all copies thereof, within ten (10) days of a written request by Defendant or its attorneys.

Dated: 5/11/2012

S/Robert H. Cleland
District Court Judge

APPROVED AS TO FORM:

/s/ Christopher W. Quinn
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